

Exhibit 1

From: Duncan Byers <dbyers@dbyerslaw.com>
Sent: Friday, October 11, 2024 3:41 PM
To: Pollack-Milgate, Deborah
Cc: Moye, John; Fehribach, Joseph; Wilkerson, Lisa; W. Ellis Boyle
Subject: [EXTERNAL] Discovery and expert matters

Importance: High

Caution: This email originated from outside the Firm.

Deborah –

We received your inadequate discovery responses on September 25, and have several issues that need to be addressed.

First, the overwhelming majority of the documents – 90% or more - are redacted in their entirety. That is on its face unacceptable. Furthermore, you have failed to provide any privilege log of any kind justifying the redactions. I am demanding that you provide a log immediately.

Second, I have gone over the sparse information that actually was provided with my damages experts at BDO and the information provided is completely inadequate for them to engage in an analysis and provide an opinion as to damages in the case. Because of that, and because of your intentional delays in providing what little information you did provide, I will be filing today a Motion for Extension of time with the Court in order to deal with the inadequate information and the inability of my experts to do any kind of damages analysis.

Finally, please provide me with your availability the first part of next week for a meet and confer regarding the redactions before I ask the Court for leave to move to compel full discovery responses.

Duncan G. Byers

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